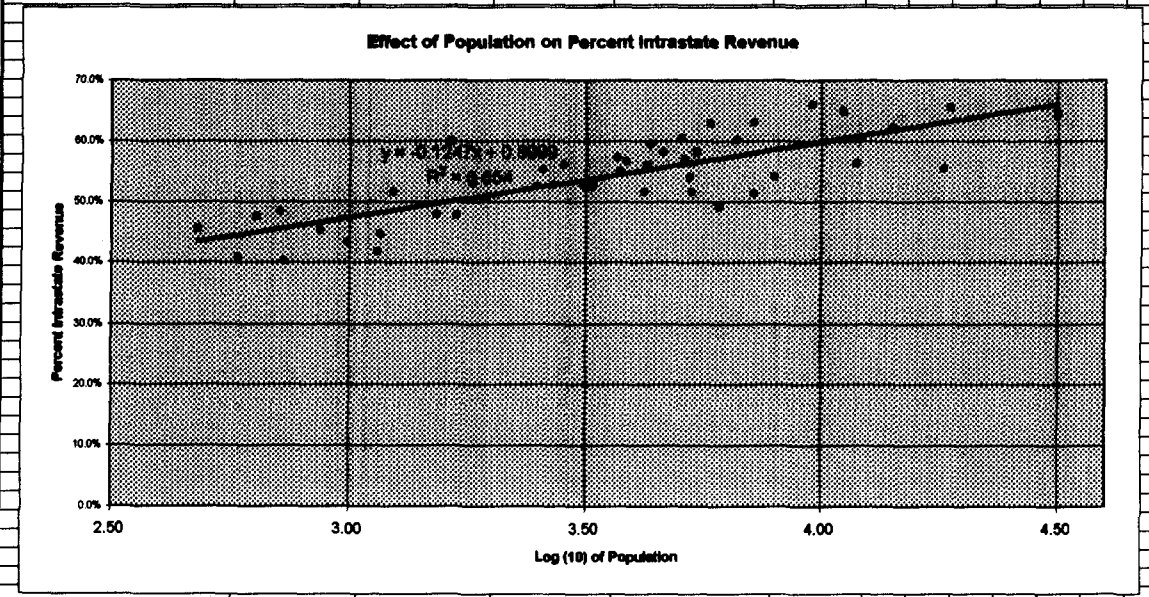


Total Revenues - 1995				
Interstate and Intrastate				
(000s)				
All LEC + Net IXC + Net Wireless + Net All Other				
	Interstate	Intrastate	Combined	Percent Intrastate
ALABAMA	1,079,109	1,378,945	2,458,054	56.1%
ALASKA	290,709	69,102	359,811	
ARIZONA	1,134,915	1,210,615	2,345,530	51.6%
ARKANSAS	675,314	749,199	1,424,513	52.6%
CALIFORNIA	6,351,070	11,550,316	17,901,386	64.5%
COLORADO	1,190,783	1,465,554	2,656,338	55.2%
CONNECTICUT	1,049,348	1,186,121	2,235,469	53.1%
DELAWARE	203,454	191,314	394,768	48.5%
DISTRICT OF COLUMBIA	523,233	424,594	947,827	
FLORIDA	3,799,983	6,270,073	10,070,057	62.3%
GEORGIA	2,088,615	2,205,402	4,294,017	51.4%
HAWAII	369,384	465,653	835,037	
IDAHO	390,549	315,360	705,909	44.7%
ILLINOIS	2,922,088	3,783,874	6,705,942	56.4%
INDIANA	1,281,575	2,168,176	3,449,751	62.9%
IOWA	644,651	825,746	1,470,397	56.2%
KANSAS	688,664	853,913	1,542,577	55.4%
KENTUCKY	888,499	1,166,481	2,054,980	56.8%
LOUISIANA	1,023,644	1,499,838	2,523,482	59.4%
MAINE	372,855	397,206	770,061	51.6%
MARYLAND	1,261,890	1,933,694	3,195,584	60.5%
MASSACHUSETTS	2,244,804	2,171,613	4,416,217	49.2%
MICHIGAN	1,871,032	3,648,845	5,519,877	66.1%
MINNESOTA	1,130,318	1,573,440	2,703,758	58.2%
MISSISSIPPI	729,808	819,094	1,548,702	52.9%
MISSOURI	2,259,632	2,413,622	4,673,254	51.6%
MONTANA	289,388	240,611	530,000	45.4%
NEBRASKA	492,877	740,233	1,232,910	60.0%
NEVADA	421,704	388,175	809,879	47.9%
NEW HAMPSHIRE	490,788	351,633	842,421	41.7%
NEW JERSEY	2,687,719	3,170,776	5,858,495	54.1%
NEW MEXICO	557,254	512,725	1,069,979	47.9%
NEW YORK	5,828,972	7,291,162	13,120,134	55.6%
NORTH CAROLINA	1,719,789	2,935,517	4,655,306	63.1%
NORTH DAKOTA	216,806	196,475	413,081	47.6%
OHIO	2,112,253	3,902,800	6,015,053	64.9%
OKLAHOMA	907,757	1,001,215	1,908,972	52.4%
OREGON	934,136	1,043,129	1,977,265	52.8%
PENNSYLVANIA	2,663,003	4,044,724	6,707,727	60.3%
RHODE ISLAND	338,449	259,005	597,454	43.4%
SOUTH CAROLINA	924,635	1,243,264	2,167,899	57.3%
SOUTH DAKOTA	282,428	176,801	439,229	40.3%
TENNESSEE	1,383,289	1,629,995	3,013,284	54.1%
TEXAS	4,272,159	8,111,640	12,383,799	65.5%
UTAH	472,040	482,690	954,730	50.6%
VERMONT	233,816	161,734	395,550	40.9%
VIRGINIA	1,732,330	2,619,627	4,351,957	60.2%
WASHINGTON	1,433,750	1,997,999	3,431,749	58.2%
WEST VIRGINIA	465,251	527,096	992,347	53.1%
WISCONSIN	1,199,146	1,591,358	2,790,504	57.0%
WYOMING	171,690	143,841	315,531	45.6%
TOTAL	68,676,515	95,502,019	164,178,534	
Maximum				66.1%
Minimum				40.3%
Average				54.1%

Analysis of Percent Interstate as a Function of Population				
			12/17/96 16:54	
	Population (000's)	Log of Population	Percent Intrastate	
ALABAMA	4,253	3.63	56.1%	Correlation 0.81
ALASKA				R Squared 0.65
ARIZONA	4,218	3.63	51.6%	
ARKANSAS	2,484	3.40	52.6%	
CALIFORNIA	31,589	4.50	64.5%	
COLORADO	3,747	3.57	55.2%	
CONNECTICUT	3,275	3.52	53.1%	
DELAWARE	717	2.85	48.9%	
DISTRICT OF COLUMBIA				
FLORIDA	14,186	4.15	62.3%	
GEORGIA	7,201	3.86	51.4%	
HAWAII				
IDAHO	1,163	3.07	44.7%	
ILLINOIS	11,830	4.07	56.4%	
INDIANA	5,803	3.76	62.9%	
IOWA	2,842	3.45	56.2%	
KANSAS	2,565	3.41	55.4%	
KENTUCKY	3,880	3.59	55.8%	
LOUISIANA	4,342	3.64	59.4%	
MAINE	1,241	3.09	51.6%	
MARYLAND	5,042	3.70	60.5%	
MASSACHUSETTS	6,074	3.78	49.2%	
MICHIGAN	9,549	3.98	66.1%	
MINNESOTA	4,610	3.66	55.2%	
MISSISSIPPI	2,897	3.43	52.9%	
MISSOURI	5,324	3.73	51.6%	
MONTANA	870	2.94	45.4%	
NEBRASKA	1,639	3.21	60.0%	
NEVADA	1,530	3.18	47.8%	
NEW HAMPSHIRE	1,148	3.06	41.7%	
NEW JERSEY	7,945	3.90	64.1%	
NEW MEXICO	1,685	3.23	47.9%	
NEW YORK	18,136	4.26	55.8%	
NORTH CAROLINA	7,195	3.86	63.1%	
NORTH DAKOTA	641	2.81	47.8%	
OHIO	11,151	4.05	64.9%	
OKLAHOMA	3,278	3.52	52.4%	
OREGON	3,141	3.50	52.8%	
PENNSYLVANIA	12,072	4.08	60.3%	
RHODE ISLAND	980	3.00	43.4%	
SOUTH CAROLINA	3,673	3.57	57.3%	
SOUTH DAKOTA	729	2.86	40.3%	
TENNESSEE	5,256	3.72	54.1%	
TEXAS	18,724	4.27	65.5%	
UTAH	1,951	3.29	50.6%	
VERMONT	585	2.77	40.9%	
VIRGINIA	6,618	3.82	60.2%	
WASHINGTON	5,431	3.73	58.2%	
WEST VIRGINIA	1,828	3.26	53.1%	
WISCONSIN	5,123	3.71	57.0%	
WYOMING	480	2.68	45.6%	





DEC 18 9 29 AM '96

STATE LIBRARIAN

December 18, 1996

Richard Sedano, Commissioner
Vermont Public Service Department
Montpelier

Dear Commissioner Sedano:

I am writing to you on behalf of the Vermont Department of Libraries and its statewide library resource sharing network concerning the Telecommunications Act of 1996. The Vermont Board of Libraries discussed this legislation at its meeting on December 10, 1996.

The Board's discussion centered primarily around the sections of the act dealing with the Universal Service Fund and potential discounts and services that could become available to public libraries. Two-thirds of Vermont's 204 public libraries are in towns with populations under 2,000. Vermont presently has an active statewide automated library network involving over 360 libraries of all types, and, further, the State library agency has been pushing local rural libraries to provide inhouse direct computer access to the rural public. The barrier to making public access widely available in small rural libraries is the telecommunications rate structure. Libraries need efficient and inexpensive telecommunications to provide citizens direct access to online information. Currently the lowest applicable business rate in Vermont is "capped" at at least \$75.00 per line, precluding more than a single line in small, poorly funded libraries. To date, the high telecommunications costs have actually discouraged local libraries from promoting public access to information.

The expressed need in Vermont is that a discounted rate structure be fair and consistent both inter- and intra-state to insure that all citizens have adequate access to materials and information regardless of user location or of the location of resources.

Secondly, it was agreed that support from the Act should also be made available for information content and the means to access the content, but that content rights must also be considered.

Thirdly, because technology will both force and drive future resource sharing among libraries and schools, the process to develop and implement a rate structure must be structured with one voice to clearly avoid potential confrontation and competition between and among libraries, schools and the health care sectors.

The Board was also concerned and urges that the established structure be

flexible. It urges that the rules, regulations, application process and paperwork be both state based and not be so unduly complex as to discourage small rural libraries, mostly staffed by untrained personnel, from participating in the process because of time and/or paperwork constraints. Many libraries in Vermont have said the cost of applying should not exceed a small percentage of the discount offered.

Fourthly, in regard to Section 254(h)(3) of the Act, if there is restriction on the resale of services, it must clearly define what this means including definitions of resale, fees, and actual costs, as well as definitions of public services and specialized research services.

Public libraries are the backbone of lifelong learning. They serve citizens of all ages and supplement all other sectors of the educational system. This FY96 TelAct should insure public libraries have the capability of providing basic access to information resources through a telecommunications infrastructure with high quality voice, data, and video capability at a cost that is affordable in even the disadvantaged rural areas.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pally', written over the word 'Sincerely,'.

Patricia E. Klinck
State Librarian

cc: Board of Libraries

[FCC.dra]

Certificate of Service

I, Peter M. Bluhm, hereby certify that on this 18th day of December, 1996, copies of the foregoing comments of the State of Vermont Department of Libraries, State of Vermont Department of Public Service, and State of Vermont Public Service Board in the above docket were served by first class mail, postage prepaid, to the parties listed on the attached service list.



Peter M. Bluhm

Service List

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

The Honorable Rachelle B. Chong,
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

The Honorable Susan Ness, Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

The Honorable Julia Johnson,
Commissioner
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable Kenneth McClure,
Commissioner
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65101

The Honorable Sharon L. Nelson,
Chairman
Washington Utilities and Transportation
Commission
P.O. Box 47250
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder,
Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Martha S. Hogerty
Public Counsel for the State of Missouri
P.O. Box 7800
Jefferson City, MO 65102

Paul E. Pederson, State Staff Chair
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Lisa Boehley
Federal Communications Commission
2100 M Street, N.W., Room 8605
Washington, D.C. 20554

Charles Bolle
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium
1200 N Street, P.O. Box 94927
Lincoln, NE 68509-4927

James Casserly
Federal Communications Commission
Office of Commissioner Ness
1919 M Street, Room 832
Washington, D.C. 20554

John Clark
Federal Communications Commission
2100 M Street, N.W., Room 8619
Washington, D.C. 20554

Bryan Clopton
Federal Communications Commission
2100 M Street, N.W., Room 8615
Washington, D.C. 20554

Irene Flannery
Federal Communications Commission
2100 M Street, N.W., Room 8922
Washington, D.C. 20554

Daniel Gonzalez
Federal Communications Commission
Office of Commissioner Chong
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Emily Hoffnar
Federal Communications Commission
2100 M Street, N.W., Room 8623
Washington, D.C. 20554

L. Charles Keller
Federal Communications Commission
2100 M Street, N.W., Room 8918
Washington, D.C. 20554

Lori Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

David Krech
Federal Communications Commission
2025 M Street, N.W., Room 7130
Washington, D.C. 20554

Debra M. Kriete
Pennsylvania Public Utilities Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Diane Law
Federal Communications Commission
2100 M Street, N.W., Room 8920
Washington, D.C. 20554

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399

Robert Loube
Federal Communications Commission
2100 M Street, N.W., Room 8914
Washington, D.C. 20554

Samuel Loudenslager
Arkansas Public Service Commission
P.O. Box 400
Little Rock, AR 72203-0400

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, Pennsylvania 17120

Michael A. McRae
D.C. Office of the People's Counsel
1133 15th Street, N.W. -- Suite 500
Washington, D.C. 20005

Tejal Mehta
Federal Communications Commission
2100 M Street, N.W., Room 8625
Washington, D.C. 20554

Terry Monroe
New York Public Service Commission
3 Empire Plaza
Albany, NY 12223

John Morabito
Deputy Division Chief, Accounting and
Audits
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20554

Mark Nadel
Federal Communications Commission
2100 M Street, N.W., Room 8916
Washington, D.C. 20554

John Nakahata
Federal Communications Commission
Office of the Chairman
1919 M Street, N.W., Room 814

Lee Palagyi
Washington Utilities and Transportation
Commission
1300 South Evergreen Park Drive S.W.
Olympia, WA 98504

Kimberly Parker
Federal Communications Commission
2100 M Street, N.W., Room 8609
Washington, D.C. 20554

Barry Payne
Indiana Office of the Consumer Counsel
100 North Senate Avenue, Room N501
Indianapolis, IN 46204-2208

Jeanine Poltronieri
Federal Communications Commission
2100 M Street, N.W., Room 8924
Washington, D.C. 20554

James Bradford Ramsay
National Association of Regulatory Utility
Commissioners
P.O. Box 684
Washington, D.C. 20044-0684

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Gary Seigel
Federal Communications Commission
2000 L Street, N.W., Suite 812
Washington, D.C. 20554

Richard Smith
Federal Communications Commission
2100 M Street, N.W., Room 8605
Washington, D.C. 20554

Pamela Szymczak
Federal Communications Commission
2100 M Street, N.W., Room 8912
Washington, D.C. 20554

Lori Wright
Federal Communications Commission
2100 M Street, N.W., Room 8603
Washington, D.C. 20554